

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

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|--|---|--|
| Heidi Tolles, |) | Civil Action No. 3:18-cv-03227-TLW-PJG |
| |) | |
| Plaintiff, |) | |
| |) | |
| vs. |) | |
| |) | |
| Corporate Solutions, LLC, and University |) | |
| of South Carolina, |) | |
| |) | |
| Defendants. |) | |
| _____ |) | |

Second Joint Motion to Amend the Scheduling Order

Pursuant to Local Civil Rule 6.01 (D.S.C.), the Parties come before the Court and respectfully submit this Second Joint Motion to Amend the Scheduling Order entered by the Court on March 26, 2020 (the “Scheduling Order”). The Parties are seeking to extend each of the remaining deadlines in this matter by ninety (90) days. In support of this Motion, the Parties would respectfully show as follows:

1. The Parties hope to be able to have in-person depositions but are not able to do so at this time due to COVID-19 and the health concerns for those involved. Should the Court grant this motion and extend the Scheduling Order, the parties have agreed to schedule the depositions for the weeks of August 17 and 24.

2. The Parties, therefore, find it necessary to request an extension of the remaining deadlines so that depositions can be scheduled to mitigate the safety concerns of the parties and their counsel due to COVID-19.

3. The Scheduling Order has previously been modified four times.

4. The proposed Fifth Amended Scheduling Order, which is attached hereto as Exhibit A, extends each of the remaining deadlines by ninety (90) days as follows:

- a. The deadline for completion of discovery would be extended from June 29, 2020 to September 28, 2020.
- b. The deadline for all other motions, except those to complete discovery, those nonwaivable motions made pursuant to Fed. R. Civ. P. 12, and those relating to the admissibility of evidence at trial, would be extended from July 27, 2020 to October 26, 2020.
- c. The case would be subject to being called for jury selection and trial after the expiration of the deadline in ¶ 7(b), OR thirty (30) days following the issuance of a Report and Recommendation on any motion described in 7(b), whichever is later.

4. Pursuant to Local Rule 7.02, counsel for the Parties have consulted prior to filing this Motion and Counsel for Heidi Tolles and the University of South Carolina consents to the Motion. Corporate Solutions, LLC does not oppose this motion. This Motion is made in good faith and not for the purpose of any delay.

WHEREFORE, the Parties respectfully ask the Court to grant this Motion to amend the Scheduling Order and to enter the Parties' proposed Fifth Amended Scheduling Order.

(Signature page to follow)

WE SO MOVE AND CONSENT:

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June 11, 2020

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Columbia, South Carolina
June 11, 2020